



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

REGULATORY
SEP 14 07 11 45
September 14, 2001
EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Sprint Communications Company L.P. for Arbitration with
BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the
Telecommunications Act of 1996*
Docket No. 00-00691

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Joint Motion of Sprint and
BellSouth to Cancel Hearing and Accept Testimony on Certain Issues.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure
cc: James Wright, Esquire

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *Petition of Sprint Communications Company L.P. for Arbitration with
BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the
Telecommunications Act of 1996*

Docket No. 00-00691

**JOINT MOTION OF SPRINT COMMUNICATIONS COMPANY L.P.
AND BELL SOUTH TELECOMMUNICATIONS, INC.
TO CANCEL HEARING AND ACCEPT TESTIMONY ON CERTAIN ISSUES**

Sprint Communications Company L.P. and BellSouth Telecommunications, Inc. (jointly "Petitioners"), hereby request the Tennessee Regulatory Authority ("TRA") to cancel the September 18, 2001 hearing scheduled in the Notice of Filing ("Notice") issued September 4, 2001 in the above case and to accept into the record stipulated testimony addressing two unresolved issues. In support of this Joint Motion, Petitioners show the following.

The Notice provided that the parties were to file an updated joint issues matrix and that a hearing would commence on September 18, 2001. The parties have diligently pursued negotiations and on September 12, 2001 the Parties filed a joint issues matrix that indicated the Parties had resolved most of the issues previously identified as unresolved in the original Petition for Arbitration, with the following exceptions:

- A) the Parties agreed to defer five issues involving performance measures (issues 22 through 26) to the TRA's generic performance measurements docket (No. 01-00193);
- B) the parties agreed to stipulate into the record without cross-examination Issue 4 dealing with UNE combinations and Issue 6 dealing with EELs; and
- C) the parties agreed that live testimony at the September 18, 2001 hearing was needed for only the seven remaining unresolved issues (Nos. 3, 7, 16, 17, 18, 29, 43, 45 b,c).

After the Parties filed the revised joint matrix, the Parties continued negotiations and have since resolved for purposes of the Sprint/BellSouth Tennessee arbitration the seven issues noted in C) above. Accordingly, the Parties do not believe it is necessary to have the hearing now set to commence on September 18. The Parties ask the TRA to cancel the scheduled hearing.

In order to address the unresolved issues in A) and B) above, the Parties request that the TRA accept the Parties' deferral of Issues 22-26 to the generic performance measures docket, and that the TRA approve the Parties stipulation and accept into the record the direct and rebuttal evidence of the Parties relating to the two issues identified in B) above. The specific prefiled testimony to be considered consists of Sprint witness Melissa Closz's direct testimony beginning on page 4, line 7 and continuing through page 11, line 4; and BellSouth witness John Ruscilli's direct testimony beginning on page 7, line 9 and continuing through page

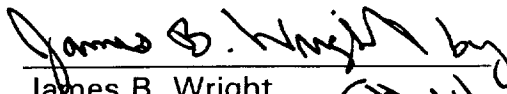
15, line 6 and his rebuttal testimony beginning on page 6, line 6 and continuing through page 9, line 19. The Parties would propose to file Briefs on these two issues, such Briefs to be filed no later than October 9, 2001.

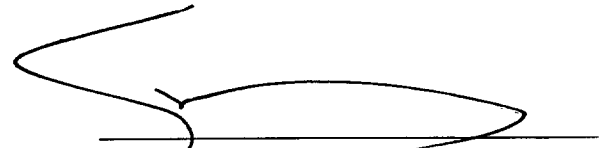
Wherefore, Petitioners ask that their Joint Motion be granted, that the hearing be canceled, that the prefiled testimony on Issues 4 and 6 be accepted into the record, and that Briefs on Issues 4 and 6 be filed on or before October 9, 2001.

Respectfully submitted,

Sprint Communications Company L.P.

BellSouth Telecommunications, Inc.


James B. Wright
14111 Capital Blvd.
Wake Forest, NC 27587
919-554-7587
GA w/ permission


Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201
615-214-6301

CERTIFICATE OF SERVICE

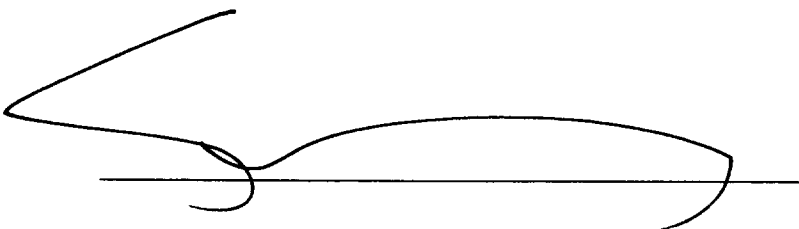
I hereby certify that on September 14, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery or U.S. Mail, postage-prepaid, addressed as follows:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight

James Wright, Esq.
Sprint Communications
14111 Capitol Blvd.
Wake Forest, NC 27587

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

William R. Atkinson, Esq.
Benjamin A. Fincher, Esq.
Sprint Communications
3100 Cumberland Circle
Atlanta, GA 30339

A handwritten signature in black ink, consisting of a large, stylized 'W' or 'J' shape, followed by a horizontal line and a small loop at the end.